



Date: 2/2/2025

**RDOOR Housing Corporation
441 W. Michigan St
Indianapolis, IN 46202**

Subject: IHCD 1st Draft QAP Comments

To whom it may concern,

Please see the list of comments in response to the Indiana Housing and Community Development Authority's 1st Draft of the 2026-2027 Qualified Allocation Plan.

4.3: Glad to see the return of the Development Location-Large City set-aside. This will help fund projects in our most densely populated Hoosier cities.

4.4: It's great to see the 2.5% increase to the Preservation set-aside. I do think that this should increase another 2.5% to a total allocation of 15% of Indiana's per capita factor.

4.3: A 2.5% reduction in both the Rural or Small City set-asides would account for the difference.

4.6: Would like to see the General set-aside category reinstated in future rounds to fund developments with sponsors with no experience in multifamily housing development that mimics the Emerging Developer set-aside round.

With the emergence of developer cohorts led by local Community Development Corporations and real estate communities like the Urban Land Institute Indiana, this creates opportunity for developers to finance projects within the communities they live, work and play.

5.1(H)(4) I think this should remain a scoring category to ensure that projects that do have awarded funds are prioritized but those who may be working to obtain awards for funding are not disqualified. The timing of these gap subsidies doesn't always align with IHCD's July submission deadline.

6.4(A) Should keep this in Leveraging Capital Resources (increase max points to 15% of TDC)

Only committed or conditional sources would qualify for points in this category

5.1(R) Minimum rehab cost per unit for projects submitted in the preservation set-aside should be \$40K per unit instead of the proposed \$50K

All other rehabs should remain at the current floor of \$25K per unit.

5.4(E) Glad to see this reduced requirement that will undoubtedly encourage the preservation of existing senior housing.

5.4(F) Happy to see the removal of minimum unit sizes. This will allow sponsors more control over costs. Having flexibility to design to your specific market is important to development feasibility.

6.2(H) Clarification as to who the appropriate authority would be for condemned properties.

I assume if this is being proposed, they'd have an idea as to who typically issues these types of documents

6.5(B) Reinstate the point category for XBE professional services and contractors

This is not a threshold requirement, so there is no obligation for federal tax credits to be rewarded exclusively for applicants who want to make this commitment.

4.1 Further clarification on non-profit qualifications.

Required salaried employee w-2 vs 1099

5.2(F) Need to confirm that rehab vs adaptive reuse replacement reserves are in line with AHIC requirements

6.2(F) Clarify non-commercial uses (ie. Parking lot, industrial, etc)

Page 25: For projects that have a Part 1 and include historic tax credits as a source, can historic credits apply as the financial commitment for this section and for leveraging where the part 1 serves as a commitment letter?

Page 38: It states, *"The Applicant commits to rent levels that receive at least the maximum 2016 points under Section G.1, "Rents Charged" scoring category."*

- G.1 does not refer to "Rents Charged". We think this should be 6.1 "Affordability".

Page 56: It states, *"If IHCD staff are unable to open or view submitted electronic documentation due to file corruption, incompatible file types, etc., staff will enlist IT support to remedy the issue. If the issue cannot be resolved, the Applicant will receive a threshold deficiency for each affected item but will be allowed to submit replacement documents. Replacement documentation cannot be submitted for scoring items. This may result in the application failing threshold and/or not receiving points in a scoring category."*

- With consideration to the imperfections of technology, we believe this should be considered on a case by case basis. If a project is submitted and there are technical issues that are **NOT** clearly due to the ignorance of the applicant, then there should



at a minimum be an allotted period to resubmit project files. If they are not uploaded timely, the project would be removed.

Point of Clarity: RDOOR administers the HomeNow program which connects those experiencing homelessness to housing. Does HomeNow meet the non-LIHTC activity requirement for non-profits?

Point of Clarity: For non-profits associated with for-profit entities, can the language include an exemption for non-profits that share staff with a for-profit entity if 100% of the proceeds from the for-profit entity support the activities of the non-profit?